

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

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**BRUCE N. SAFFRAN, Ph.D., M.D.,**

Plaintiff,

v.

**BOSTON SCIENTIFIC CORPORATION,  
A DELAWARE CORPORATION,**

Defendant.

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) **CIVIL ACTION NO. 2:05-CV-547-TJW**  
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**PLAINTIFF'S TRIAL WITNESS LIST<sup>1</sup>**

A. WITNESSES EXPECTED TO BE CALLED AT TRIAL

1. Dr. Bruce N. Saffran, Ph.D., M.D.  
Plaintiff
2. Shraga Nahum Goldberg (live or by video depo)  
Associate Professor, Harvard Medical School  
Director of Abdominal Radiology and Intervention, Beth Israel Deaconess  
Hospital
3. James J. Barry (by video depo)  
Vice President of the Corporate Research and Advanced Technology  
Development Group, Boston Scientific Corporation
4. Douglas E. Godshall (by video depo)  
Former President of Vascular Surgery, Boston Scientific Corporation
5. Russell D. Jamison, Ph.D.  
Expert for Plaintiff
6. Benny D. Freeman, Ph.D., P.E.  
Expert for Plaintiff

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<sup>1</sup> Dr. Saffran reserves the right to amend this list to include witnesses whose depositions are taken after the service date of this witnesses list.

7. Alan Ratliff, CPA, JD  
Expert for Plaintiff

B. WITNESSES THAT MAY BE CALLED AT TRIAL

1. Warren Clark (by video depo)  
Controller of the Cardiovascular Division, Boston Scientific Corporation
2. Eric Simso (by video depo)  
Vice President of Interventional Cardiology Marketing, Boston Scientific Corporation
3. Timothy O'Shea (by video depo)  
Vice President, Business Development, Boston Scientific Corporation
4. Expert(s) to Rebut one or more of the Opinions of Experts offered by Boston Scientific  
To be named by the date ordered in the Docket Control Order

Dated: October 24, 2007

Respectfully submitted,

By: 

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Attorneys for Bruce N. Saffran, Ph.D., M.D.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email and/or fax, on this the 24th day of October, 2007.

A handwritten signature in black ink, appearing to read "Eric M. Albritton", written over a horizontal line.

Eric M. Albritton